

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

IN RE:

CASE NO. 19-04547-BKT

GIOVANNI MARIN IRIZARRY  
WALESKA OLIVO SANTIAGO

CHAPTER 13

DEBTOR(S)

**MOTION TO INFORM AS TO STATUS OF PROCEEDINGS**

TO THE HONORABLE COURT:

**COMES NOW,** UNDERSIGNED COUNSEL, and in support of the instant Motion to Inform, herein STATES, ALLEGES, and PRAYS as follows:

1. A hearing on Confirmation is scheduled in the above captioned matter for November 12, 2020. See, Dk. #73.
2. To prepare the case for confirmation Undersigned Counsel has undertaken multiple steps to contact Debtor and request the necessary documents. Notwithstanding Undersigned's best efforts, however, contact with the Debtor has not been successful.
3. Accordingly, Undersigned herein respectfully informs this Honorable Court that he has lost meaningful contact with the Debtor. Accordingly, the Debtor's case stands where it stands, and Undersigned cannot significantly move the case forward in absence of the Debtor's cooperation.
4. Undersigned respectfully requests that this Honorable Court be informed by the information herein.

**WHEREFORE** it is informed to this Honorable Court to take notice of the above mentioned and grant any relief it deems just and proper.

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on this same date, I electronically filed the above document with the Clerk of the Court using the CM/ECF System which will send a notification, upon information and belief, of such filing to the followings: THE UNITED STATES TRUSTEE.

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FOR THE DISTRICT OF PUERTO RICO**

**RESPECTFULLY SUBMITTED**

IN SAN JUAN, PUERTO RICO, this 10<sup>th</sup> day of November 2020.

**THE BATISTA LAW GROUP, PSC**  
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